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Review of international regulations governing the thermal insulation requirements of residential buildings and the harmonization of envelope energy loss



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ABSTRACT

There is currently a lack of harmonization in the building energy efficiency requirements that are mandated by different countries. Energy efficiency is defined by the energy yield of the facilities and by the envelope energy losses. These energy losses are mainly conditioned by the thermal envelope transmittance, the compactness factor, and the indoor temperature.

This paper compares the requirements imposed on these three energy factors in residential buildings by various countries of the European Union (Germany, France, the UK, and Spain) and the United States of America. The paper also discusses the causes of the divergences in the requirements and their degrees of disparity. The paper further compares the requirements of the Passivhaus construction standard, which is highlighted by the European Union as an example of residential buildings with virtually zero energy consumption (nearly zero-energy buildings), similarly to the buildings that European countries will be forced to build by 2020.

Within the current regulations, the thermal transmittance is the only factor that is used to compare the thermal insulation of buildings. However, this paper demonstrates that the thermal transmittance is not a valid parameter for the comparison and harmonization of the envelope energy losses because countries set different transmittance values for each climate zone, which are defined on the basis of different ranges of degree-day variation and are calculated using different base temperatures. Furthermore, this paper proposes a new methodology that can be used to regulate the thermal insulation of buildings to ultimately harmonize the envelope energy losses across all countries.

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1. Introduction

A current worldwide concern involves the efforts that are aimed at reducing energy consumption and CO_2 emissions [1], which are mainly produced by industry, transportation, and construction activities [2,3]. The building sector is responsible for approximately 40% of the consumption and greenhouse gas emissions [2–4]. Two-thirds of these emissions result from residential buildings [5–8], which exhibit the greatest potential for energy savings [9,10].

In light of this fact, guidelines have been published in the United States of America (USA) that contain recommendations for achieving a 50% reduction in the energy consumption of non-residential buildings (residential buildings are not regulated) [11]. In 2012, the National Global Change Research Plan of 2012–2021: A Strategic Plan for the U.S. Global Change Research Program [12] was approved. This plan aims to monitor, investigate, and report the current status of CO₂ emissions and energy consumption and provides solutions to prevent climate change. However, this plan does not commit to any concrete measures to reduce CO₂ emissions. Over the past year, several guidelines have been published, which include possible modifications to existing laws that govern such emissions [13–15].

In 2002, the European Union (EU) adopted the first mandatory Directive on Energy Efficiency in Buildings [16], which was amended in 2010 (and is currently enforced) to comply with new targets approved in 2007 to curb climate change. These objectives are collected within a package of measures to be complied with by EU countries called "20-20-20" [17]. One of the objectives of "20-20-20" is a 20% reduction in energy consumption and CO₂ emissions by 2020 and the prevention of global warming. Other objectives include an increase in the competitiveness of member countries [18-20] and the reduction of economic imbalances that result from the growing energy dependence on fossil fuels [21-25]. This directive also requires that all new buildings to be constructed in the EU starting in 2020 consume virtually zero energy (nearly zero-energy buildings) [17]. In the absence of a precise definition of these buildings' characteristics, the Passivhaus construction standard is used as a reference standard [26].

The 2010 Directive on Energy Efficiency in Buildings indicates that the energy efficiency requirements set by the member states vary considerably, and a number of these requirements are far from the optimal level of profitability [17]. Thus, in 2011, the EU warned of the need to harmonize these requirements in all the member countries [27–29]. The lack of harmonization was due mainly to the fact that the Directive did not demand quantitative

requirements and to the lack of a standard methodology for the calculation of the energy performance of buildings [9,28]. It has also been confirmed that this lack of harmonization occurs internationally. Although the methodology was defined by a regulation in 2012 [30], quantitative values for factors that define the energy efficiency of buildings do not yet exist.

This paper intends to harmonize these quantitative values. The comparison and analyses are focused on the study of residential buildings. The topics covered in this article are the following.

1.1. Determination of the degree of disparity between the requirements set by various countries for the principal factors that define the thermal envelope energy loss and analysis of their causes

The main design factors that affect the envelope energy loss and therefore the energy demand due to the thermal loads of airconditioned buildings are the thermal envelope transmittance, the compactness factor, and the indoor temperature [17,31–37]. Therefore, these factors are the most important factors that limit the total power consumption [37–39] because the energy consumption during their use ranges between 80% and 85% of the total life cycle energy consumption [5,37–39]. Currently, all the analyzed regulations set maximum energy consumption limits for an entire building, including its facilities, such that insulation deficiencies can be compensated by more efficient equipment or by the installation of renewable energy sources. The installation and maintenance of these measures are more costly than the placement of an adequate insulation thickness.

This paper reviews the rules established in four European countries (Germany, France, the United Kingdom (UK), and Spain) and the United States (Section 2). In each of these countries, the thermal envelope transmittance, the compactness factor, and the indoor temperature requirements will be analyzed. These requirements will be compared with the requirements of the Passivhaus construction standard. In this review, both the values required by the different regulations (Sections 3.3–3.5) and the parameters used to regulate these values will be analyzed (Section 3.2).

This paper will show that the transmittance, which is currently the only factor that governs the thermal insulation of buildings in the regulations under study, is not a valid parameter for the comparison and harmonization of the envelope energy loss. The reason for this fact is that each country currently defines climate zones for which different transmittance limits are set based on different ranges of degree-days and calculated with different base temperatures (Section 3.4).

1.2. Proposal of a methodology to harmonize the envelope energy loss

A series of steps to achieve this harmonization on an international basis will be presented. These steps start with the creation of a degree-day map that is common to all countries and results in the implementation of a new energy factor that univocally controls the thermal insulation required to harmonize the envelope energy loss.

2. Legislative framework governing the design factors under study

2.1. Regulation of design factors at the supranational level

Both the EU and USA regulate the energy efficiency factors in buildings through mandatory regulations with which all member states must comply. The following summarizes the method by which both regulate these factors. The main difference between these regulations is that the EU only provides qualitative guidelines, whereas the USA mandates quantitative values that various energy factors must achieve.

The complete regulatory framework is presented in Table. 1.

2.1.1. USA

The Code of Laws of the United States of America (U.S.C.) compiles and codifies the general and permanent federal laws of the USA. The foundations and requirements of the Energy Conservation and Production Act (ECPA) [40] are found in this document. To develop the ECPA, the Department of Energy (DOE) approved several amendments to the Energy Efficiency Design Standards for New Federal Commercial and Multi-Family High-Rise Residential Buildings and New Federal Low-Rise Residential Buildings [41]; the most recent amendment was published in 2011. It specifies that the reference document regulating the energy efficiency requirements in commercial buildings and multi-family high rise residential buildings with more than three stories is the

Standard 90-1-2010, which was published by the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE). Of the Building Codes developed by the International Code Council (ICC), the International Energy Conservation Code (IECC) [42–44] applies to low-rise residential buildings (three stories or fewer). These code's guidelines can specifically vary by state, county, or city to meet local requirements; this variation reflects both the regional construction practices and specific energy efficiency objectives [43]. Of the two regulations that govern the thermal transmittance, the ASHRAE 90-1-2010 standard is more restrictive and complete [45].

In addition to these regulatories, ANSI facilitates the development of American National Standards (ANS) by accrediting the procedures of standards developing organizations. In many instances, U.S.A. standards are taken forward to International Standard Organization (ISO).

2.1.2. EU

At the EU level, the supranational regulations are known as European Directives, and their single purpose is to unify the objectives and factors that should be considered to fulfill their requirements. The Directive that regulates the energy efficiency of buildings is Directive 2010/31/EU. This directive's main objective is to promote the energy efficiency of buildings in the European Union by taking into account weather conditions, indoor climate requirements, and cost-effectiveness [17]. Moreover, the European Committee for Standardization (Comité Européen de Normalisation, CEN) publishes a series of standardized regulations designated European Standards (ENs); the purpose of ENs is to set the calculation fundamentals and the verification of various elements and procedures. These ENs should later receive the status of a national standard in all of the CEN member countries.

Each EU country, according to the provisions of the Directives and ENs, develops its own national regulations. It is in these national regulations where a set of numerical values of the energy factors are subsequently set to achieve the objectives of energy efficiency that are required by the Directive.

Table 1Regulatory framework in the countries under study. This information was compiled by the author.

Entity	At the supranational level		Country or state				
			Country	General construction regulations	Main regulations governing the energy factors under study		
EU	European Directives: 2010/31/EU		Germany	Energieeinsparungsgesetz- EnEG	Energieeinsparverordnung – EnEV DIN 18599-2010		
			France	R. 111-20 du code de la construction et de l'habitation	Arrêté du 24 mai 2006 Décret No. 2006-592 du 24 mai 2006 NF EN ISO 7933		
			UK	Building Act 1984	SAP 2009 Building Regulations 2000:		
				(England and Wales)	 Approved Document L1A/2010 BS EN 7730 		
	European Standard (EN)		Spain	Ley Ordenación de	Código Técnico de la Edificación: • DB HE-1		
	Qualitative insulation requirements		Each cour	la Edificación ntry issues its own regulations v	• RITE with different numerical values.		
USA	US Codes: Energy Conservation and Production Act International Code Council (ICC): International Energy Conservation Code 2009 (IECC) ASHRAE Standards: Standard 90-1-2010 Standard 55-2004		Each state adapts regulations for its construction practices or its own obje does not set lower quantitative values.				
	American National Standards (ANS; e.g., ISO and IEC) Quantitative insulation requirements						

2.2. Normative governing the design factors in different countries

It has been observed that the USA sets quantitative values for these factors at the federal level, although a degree of variation within states is observed if these are necessary to adhere to the local construction practices. In contrast, the European 2010 Directive does not provide quantitative data, which are included in the normative of each country. Of the EU countries, the regulations of Germany, France, the UK, and Spain have been selected because these represent different climates.

2.2.1. Germany

In Germany, the energy efficiency of buildings and the guidelines to achieve the specified energy savings are regulated by the 1976 Law of Energy Saving (Energieeinsparungsgesetz, EnEG), the latest revised text of which was published in 2009 [46]. Over several years, various energy saving ordinances, which state the requirements, have been published. Currently, the 2009 EnEV Energy Conservation Ordinance (Energieeinsparverordnung, EnEV) [47] is in effect; this ordinance regulates, among other aspects, the values of various thermal envelope parameters that are required for compliance with this regulation. To adapt the legislation to the 2010 Directive, a document was published in 2012 to detail the guidelines that are necessary to progressively amend the law. It is expected that all changes to be implemented will take effect in 2014 [48]. Regarding the indoor temperature, the DIN 18599-2010 standard [49] establishes the thermal comfort parameters that must be considered in the calculation of the energy efficiency of buildings.

2.2.2. France

In France, the general habitability conditions that buildings must fulfill, as well as the construction processes and contractual relations, are established in the R. 111-20 Law: Construction and Habitability Code (Du Code de la construction et de l'habitation) [50]. The energy efficiency requirements for residential buildings and other required values that define it are established in the Order of May 24, 2006: Concerning the thermal characteristics of new housing and its components (Relatif aux caractéristiques thermiques des bâtiments nouveaux et des parties nouvelles de bâtiments) and in Decree no. 2006-592 of 24 May 2006: Concerning thermal characteristics and construction energy goals (Relatif aux caractéristiques thermiques et à la performance énergétique des constructions), as well as in subsequent occasional amendments that were published in 2010 [51–54]. The standard that regulates the indoor climate conditions is the NF EN ISO 7933 [55].

2.2.3. UK

In the UK, the criteria for the calculation and verification of the compliance requirements for the energy efficiency of buildings were developed in general terms for all the constituent countries in the UK. These criteria are detailed in the Standard Assessment Procedure (SAP 2009) [56]. Each constituent country (England and Wales, Scotland, and Northern Ireland) subsequently publishes its own regulations, which dictate the ultimate objectives of energy efficiency and the numerical values that specific energy factors must achieve. The common law of England and Wales was selected for this study. In England and Wales, the definitions, procedures, and performance levels that should be met by buildings are included in the 1984 Building Act and subsequent amendments [57]. These performances are developed under a compendium of 14 documents, which are known as the Building Regulations of 2000. Of these, the document governing the energy efficiency of residential buildings is the 2010 edition of Approved Document L1A: Conservation of fuel and power-new dwellings [58].

However, the indoor climate conditions are regulated by British Standard (BS) EN 7730 [59].

2.2.4. Spain

In Spain, the minimum habitability conditions of buildings and the legal conditions of the construction process are regulated by the Building Planning Law of 1999 (Ley de Ordenación de la Edificación) [60]. These standards are developed under a compendium of documents published in 2007 that are designated the Technical Building Code (Código Técnico de la Edificación) [61]. Of this normative documentation, the DB HE 1: Limitation of Energy Demand is the rule that regulates the thermal insulation requirements of the envelope [62]. There are two alternatives for the fulfillment of these insulation requirements: the simplified option, which requires maximum transmittance values for the enclosures, depending on the type of construction and maximum transmittance values depending on the location of the building, and the general option, which requires that the annual energy demand of the planned building be lower than that of a reference building with the same geometry (and whose enclosure transmittances correspond to the maximum transmittances required in the simplified option). The indoor climate characteristics that should be achieved by buildings are included in DB HE 2: Regulation of Thermal Facilities of Buildings (Reglamento de Instalaciones Térmicas de los Edificios) [63].

2.3. Regulation of the factors analyzed in the Passivhaus standard

The Passivhaus construction standard was developed in Germany by the Darmstadt Passivhaus-Institute. The first buildings constructed under this standard were built in central and northern Europe and were promoted by the CEPHEUS European Project (Cost Efficient Passive Houses as European Standards). Currently, this type of construction is spreading across Europe, including toward the countries in the south. To accomplish this regulation, a portion of the design criteria are been modified to adapt the standard to the needs of Mediterranean climates [64,65]. This type of housing is notable for its low energy consumption, and it limits its heating and cooling demands to 15 kW h/(m² · year). To achieve this level, this regulation provides the transmittance values that must be achieved by enclosures. This construction standard is internationally recognized: other countries, such as the UK and Germany, use these energy efficiency requirements as the objectives to be achieved by their building regulations. As previously mentioned, the EU uses the requirements contained in this standard as design principles for the construction of nearly zero-energy buildings [26].

3. Comparative analysis of the building envelope thermal transmittance, the building compactness factor, and the indoor temperature

3.1. Definition of the energy parameters under study

3.1.1. Thermal envelope transmittance

The definition of the thermal envelope developed by the IECC includes basement walls, exterior walls, floors, roofs, and any other building element enclosing the conditioned space. These limits include the boundary between all conditioned space and any exempt or unconditioned space [44].

The concept of the thermal transmittance of the enclosure (U-Factor) is defined as the coefficient of heat transmission (air to air) through a building component or assembly, equal to the time rate of heat flow per unit area and unit temperature difference between the warm side and cold side air films $(W/(m^2 \, K))$ in the

rest of Europa and Btu/(h ${\rm ft}^2$ °F) in United Kingdom and USA) [44]. The thermal transmittance of an enclosure is calculated according to the following equation:

$$U = 1/R_i + \sum \lambda_i / e_i + 1/R_e \tag{1}$$

where λ_i is the thermal conductivity of each material that composes the enclosure in W/(m K), e_i is the thickness of each layer of material in meters, and R_i and R_e are the surface thermal resistances corresponding to the interior and exterior air, respectively, in m² K/W.

The above-mentioned countries limit the thermal envelope transmittance through several parameters:

- The *transmittance limit of each element* of the envelope, depending on the enclosure construction type (U_{max}).
- The average transmittance limit of a set of enclosures, depending on its location in the building, which primarily differentiates between walls, floors, roofs, and gaps (U_{med}).
- The *overall heat transfer coefficient of the building (H)*, which is the average of the average maximum transmittance of each enclosure weighted by the surface area. This parameter is calculated according to the following equation:

$$H = \sum U_i \bullet A_i / \sum A_i \text{ in W} / (m^2 \text{ K})$$
 (2)

where U_i is the thermal transmittance of each enclosure in W/(m² K) and A_i is the area of each enclosure with the specified transmittance in m².

The maximum values of these transmittances are specified to limit the energy loss through the thermal envelope of the buildings. The energy losses that occur through each enclosure of the envelope are calculated using the following equation:

Energy loss through the enclosure in a year(in W) =
$$\Sigma U \cdot A$$

 \cdot (degree – days per year) (3)

where U is the thermal transmittance of the enclosure $(W/(m^2 k))$, A is the area of the enclosure (m^2) , and the annual degree-days indicate the sum of the existing differences between the average outside temperature and a reference temperature (base temperature), which is the starting temperature at which it is necessary to air condition the rooms, for each day of the year. The number of degree-days is calculated as the sum of the degree-days for heating and the degree-days for cooling, which are calculated using Eqs. (4) and (5), respectively:

$$HDD = \sum_{1}^{N} (T_{base} - \overline{T}_{i}) \text{ in } K$$
 (4)

$$CDD = \sum_{i=1}^{N} (\overline{T}_i - T_{base})^+ \text{ in K}$$
 (5)

where N is the number of days in the winter (Eq. (4)) or in the summer (Eq. (5)), T_{base} is the reference temperature to which the degree-days are calculated, and \overline{T}_i is the mean daily temperature calculated by adding the maximum and minimum temperatures for the day, then dividing by 2. The+super-script indicates that only positive values of the bracketed quantity are taken into account [66].

3.1.2. Compactness factor

The compactness factor is defined as the ratio of the volume to the outer surface of the building enclosure. This factor is related to the heat storing capacity of the building and its ability to avoid heat loss through its enclosure. A notably compact building is one that has a high volume-to-surface ratio [23]. Eq. (3) defines the compactness factor of a building:

$$C_f = S_e/V \,(\mathrm{m}^2/\mathrm{m}^3)$$
 (6)

where S_e is the envelope surface of the building and V is the inner volume of the building in m^3 .

Several studies have shown that a greater reduction in the energy consumption is achieved with a smaller relationship between the outer surface and the volume enclosed by the enclosure of the building [30–32], especially in cold climates [33]. Therefore, the maximum transmittance values that should be set relate to this factor [34].

In fact, some countries (such as Germany and France) require different overall heat transfer coefficients, depending on the building typology, to differentiate between housing blocks and single-family houses. This differentiation is based on the different compactnesses of each building typology.

3.1.3. Indoor temperature

The indoor temperature is the temperature of the air inside a room. The ranges of values within which this temperature must fall are regulated as the operating temperature in all the standards discussed in this study. The operating temperature is calculated as shown in the following equation [67]:

$$T_{\rm op} = (h_{\rm c} * T_{\rm amb} + h_{\rm r} * T_{\rm rm})/(h_{\rm r} + h_{\rm c}) \text{ in K}$$
 (7)

where $T_{\rm op}$ is the operating temperature in K, $T_{\rm amb}$ is the indoor temperature in K, $T_{\rm rm}$ is the mean radiant temperature of the inner surface of the envelope that delimits the enclosure in K, and $h_{\rm c}$ and $h_{\rm r}$ are the respective convection coefficients in W/(m² K). $T_{\rm rm}$ is usually similar to the temperature of the indoor air, but it is more accurate to calculate the $T_{\rm rm}$ weighted by the area and the temperature of each of the walls, floors, and ceilings if there is a relatively warm (e.g., roof in the summer) or cold (e.g., windows in the winter) surface.

The range of the indoor temperature, and therefore the operating temperature, is not always the same but depends on various factors that determine the most suitable temperature that provides thermal comfort to the room. This thermal comfort index is measured as the percentage of people dissatisfied (PPD), which predicts the percentage of people who notice that the room is either too cold or too hot [68]. The ideal room temperature to achieve a given PPD depends on several parameters, highlighting:

- The metabolic rate is the speed at which an organism uses the available energy and is estimated by measuring the release of heat. This parameter, which is measured in met or W/m² (1 met=58 W/m²), depends on the intensity of the activity. If the metabolic rate increases, the ideal operating temperature may be lower.
- The thermal insulation of clothing is measured by Clo (1 Clo=0.155 m² °C/W) and is estimated according to the combination of clothing: the thermal insulation of a naked person has a value of 0.0 Clo, whereas the thermal insulation of someone wearing a business suit has a value of 1.0 Clo. If the thermal insulation is higher, the ideal operating temperature may be lower.
- The air speed increases the cooling or heating of the body and the sensation of thermal discomfort and other discomforts when turbulence is perceived. In sedentary conditions, the air speed should be limited to less than 0.25 m/s under cold conditions and to less than 0.50 m/s under hot conditions because discomfort is caused by temperature differences.
- A high relative humidity limits the evaporation of sweat, particularly when combined with high temperatures and either low air speed or intense activities. These factors would create an uncomfortable sensation that could be offset by other factors.

The numerical values selected for each factor are listed in Section 3.5, which shows a comparison of the temperature ranges that are required by the different countries.

3.2. Regulation of energy factors in the normatives of the analyzed countries

This section lists the parameters that define the standards that regulate each energy factor under study. Table 2 shows a summary of the regulations of the thermal envelope transmittance and the compactness factor, whereas Table 3 presents the indoor temperature regulations.

The thermal envelope transmittance is directly regulated by two parameters: the transmittance limit, which depends on the enclosure construction type ($U_{\rm max}$), and the average transmittance limit, which depends on the location of the enclosure ($U_{\rm med}$). German, British, and Passivhaus standards only regulate the $U_{\rm max}$ parameter, whereas the USA only regulates the $U_{\rm med}$ parameter. In contrast, Spain and France set maximum values for both parameters, and France also limits the maximum allowed transmittance of the envelope joints.

In all the countries studied, except the UK, the envelope transmittance value limits are stated, and thus the planned facilities are considered in the calculation of the energy

Table 2Compactness factor and thermal envelope transmittance requirements in the regulations studied.

Entity	Regulation	Scope	Manner in which the design factors are regulated					
			Compactness factor (m ² /m ³)	Parameters governing the building thermal envelope transmittance (W/(m^2 K))				
				U _{max}	U _{med}	Н		
European Union								
EU Specific European	2010/31/EU Union Countri	All types of buildings	Not regulated	Not regulated	Not regulated	Not regulated		
Germany	EnEV-2009	Commercial and residential buildings ^a	Defines different building typologies	Not regulated	Sets the same value for the whole country	Value is conditioned by the building typology		
France	Arrêté du 24 mai 2006	Residential buildings (except those used for less than 2 years)	Defines different building typologies	Sets the same limit for all climate zones	Defines two climate zones for which different limits are set	Value is conditioned by the building typology		
England and Wales	Document L1A	New dwellings in England and Wales	Not regulated	Not regulated	Their limit value is the value that complies with the maximum CO ₂ emissions depending on the facilities included	Not regulated		
Spain	DB-HE · 1	New houses	Not regulated	Defines five climate zones for which different limits are set	Defines five climate zones for which different limits are set	Not regulated		
Passivhaus- Institute Darmstadt	Passivhaus Institute	All types of buildings	Suggests a maximum numerical value	Not regulated	Defined in central and northern Europe ^b	Not regulated		
United States of A ASHRAE	Standard 90- 1-2010	Commercial and residential buildings with more than three floors	Not regulated	Defines eight climate zones for which different limits are set ^c	Same values as $U_{\rm max}$	Not regulated		

a Residential (used at least 4 months per year) and non-residential buildings: distinguishes between new and existing buildings.

Table 3Temperature regulations in the standards examined in this study.

Agency/country	Regulation	Scope	$T_{\rm op} = T_{\rm amb} + T_{\rm rm}/2$
International			
ISO	ISO 7933	Conditioned areas in all types of buildings	Offers a range
European Union			
CEN	EN 1525	Conditioned areas in all types of buildings	Offers a range
Specific Country of European U	Inion		
Germany	DIN 4701	Conditioned areas in all types of buildings	Offers a range
France	NF EN ISO 7933	Conditioned areas in all types of buildings	Offers a range
United Kingdom	BS EN 7730	Conditioned areas in all types of buildings	Offers a range
Spain	RITE	Habitable areas	Offers a range
Passivhaus-Institute	Passivhaus requirements	All type of buildings	Offers a range
United States of America			
USA	55-2004 Standard	Residential and commercial buildings	Provides a formula

^b Provides the same value for all central Europe and is now being adapted to Mediterranean climates.

^c Requires both a minimum *R*-value of insulation to be included in the enclosure in addition and a maximum *U*-value for the entire enclosure (with all its layers).

consumption and CO_2 emissions of the building to verify that the values are below the limits set by the regulations. The normative of England and Wales does not establish univocal numerical maximum transmittance values for all buildings (these regulations only set the transmittance limits necessary such that there is no condensation in the enclosures). Unlike the regulations in the other countries that were surveyed, the selection and calculation of the planned facilities are performed first, followed by the calculation of the thermal envelope transmittance to satisfy the maximum CO_2 emission and energy consumption set by SAP. A guide document that was prepared by the Housing Research Foundation provides transmittance data for different building types (with different combinations of facilities) that are in compliance with these maximum values [69].

In the USA, in addition to the requirement of a maximum U-value for the full enclosure with all its layers (comparable to the $U_{\rm med}$), the regulations also stipulate compliance with a minimum thermal resistance (R-value, measured in m^2 K/W) of the interior of the enclosure. Unlike the European standards, which stipulate that the designer must always calculate the transmittance of the selected enclosures, the ASHRAE Standard 90-1-2010 provides these values for different construction types and various thermal resistances of the insulation in an appendix.

In the Passivhaus standard, the ultimate design goal of the envelope is to achieve an energy demand of less than $15 \, \text{kW h/m}^2$ year for both heating and cooling. The transmittance values required for different envelope types to achieve this level are provided. These values were studied for the weather conditions in Central Europe and are the most restrictive of all the regulations examined. The extrapolation of the required insulation values for Mediterranean climates is questioned due to its dubious economic profitability [65,70–74].

Indirectly, the enclosure transmittance is also regulated by the overall heat transfer coefficient of the building. It has been noted that Germany and France set values for this parameter, whereas other countries do not regulate it. The Passivhaus standard provides only an approximate value.

With the exception of Germany, all the countries studied divide their geography into different climate zones, in which different transmittance values are required. Each of these climate zones includes all the geographical areas that exhibit a number of annual degree-days within a given range. As shown in Table 2, there is also a significant variation in the number of climate zones that each country defines. The most extreme case is Germany, which requires the same transmittance for the whole country. In France, three climate zones are defined according to the temperature and relative humidity: H1, H2, and H3. To set different transmittances values, the regulations distinguish only two zones: one includes zones H1 and H2 and part of zone H3 (the sections that are located at an altitude greater than 800 m), and the other includes the sections of zone H3 that are located at an altitude less than 800 m. In Spain, different transmittance values are required depending on five different climate zones, which were defined depending on the severity of the winter climate: A, B, C, D, and E. These climate zones are in turn divided into different subzones depending on the severity of the weather in the summer. In the USA, different transmittances were set depending on eight climate zones, which are numbered from 1 to 8. Each of these zones is divided into different subzones depending on the relative humidity.

It is therefore evident that there is a lack of agreement both in the measures used to regulate the factors under study and in the quantitative values that are set for each of these factors.

Table 3 shows that the regulating temperature (through the operating temperature) is quite harmonized. This harmonization is due to the existence of the international ISO 7933 standard [75], which provides a calculation method and adequate operating

temperature value ranges based on the parameters that are defined in Section 3.1.3. The quantitative values that are required for each energy factor are analyzed and compared below.

3.3. Comparison of the thermal envelope transmittances

3.3.1. Preliminary considerations

To allow the comparison of the transmittances among all the normative requirements with their corresponding equivalent values, one must select the required transmittance in geographical zones that are within the same range of degree-days. Thus, regions with very similar annual degree-day values were included in the comparison. The problem that has been identified with this analysis is that each country sets transmittances based on the definition of climate zones, and these zones are determined using different criteria of degree-day variations and different base temperatures. To compare the range of degree-days that each country includes in each of its climate zones and to verify the magnitude of their differences, one must find a map of the degreedays in Europe and the USA that is calculated using the same base temperature and using degree-day ranges that have the same range of variation. The uniformity of winter maps is prioritized because heat loads are higher in the winter than in the summer in the areas that were studied. These maps are shown for a base temperature of 18.5 °C and a range of 1000 heating degree-days (Fig. 1). The selected areas in each country are indicated by a cross on the heating degree-day map.

3.3.2. Analysis of the problems detected

Table 4 shows the total variation in degree-days (Fig. 1) and the number of climate zones defined for each country studied in Europe and the USA.

As shown, Spain is the country that defines the most climate zones in relationship with the existing variation in the number of degree-days. France, England and Wales, and the USA have an equivalent division, whereas Germany, despite being the country (of those studied) with the greatest variation in degree-days throughout its territory, does not define distinct climate zones. Thus, the energy losses occurring through the envelope when setting such transmittances will be notably different, even when comparing the transmittances required in regions with similar degree-days.

This difference occurs because each country sets transmittances according to its climate zones (instead of calculating the necessary transmittance levels based on the actual number of degree days), each of which have a notably different variations of degree-days in each country. Thus, the transmittance, as currently defined through the creation of climate zones with different criteria among the different countries, is not a valid factor for the comparison and harmonization of the envelope energy loss and therefore the thermal insulation requirement. The comparative values of the transmittances imposed by the different regulations are shown below to qualitatively compare the restrictive nature of each country.

3.3.3. Comparison tables

Geographical zones with winter degree-days in the range of 3000–4000 were selected for the comparison. This range of winter degree-days was selected because it is the only range that is found in all the countries that were considered in this analysis. For each country, the comparison includes the transmittance of the climate zone corresponding to the selected geographic area.

The climate zones in which the selected regions are located in each country, as shown in Fig. 1, are the following:

 Because Germany requires the same transmittance value throughout the country, any zone is valid for the comparison.

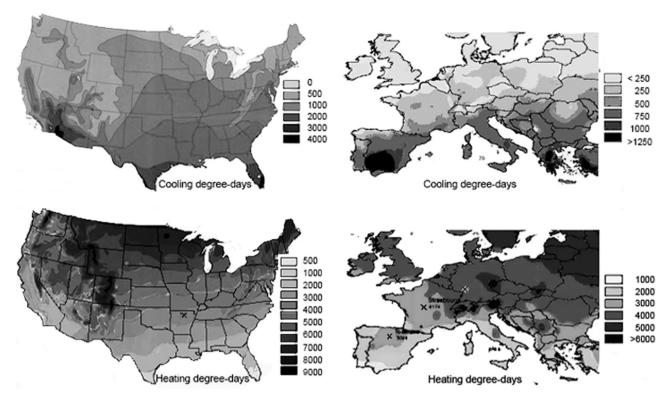


Fig. 1. Degree-days for heating and the degree-days for cooling, in USA and Europe. Tbase: 18.5 °C.

 Table 4

 Variation in the number of heating and cooling degree-days and the number of climate zones that are defined in the countries under study.

Relationship between variation of degree-days and climate zones	Germany	Franc	U.K. (England and Wales)	Spain	Passivhaus	USA
Variation in the number of degree-days during the winter	2000->6000	2000-4000	3000-4000	1000-3000	2000->6000	1000–9000
Variation in the number of degree-days during the summer	<250-250	< 250-750	< 250	250- < 1250	<250-500	0–4000
Number of climate zones for which transmittances are set	1	2	1	5	1	8
Approximate range of heating degree-days contained in each climate zone	4000	1000	1000	400	4000	1000

- In France, the selected region belongs to the climate zone that includes zones H1, H2, and the parts of zone H3 with an altitude greater than 800 m.
- In England and Wales, the southern coastal zone was selected. Of all the possible transmittance options provided by the Housing Research Foundation study to comply with the required CO₂ emissions, the most common combination was used, which corresponds to a housing block with a gas-powered radiator for heating and solar panels for hot water [70].
- In Spain, the region within the range of degree-days selected is in zone E.
- In USA, the selected area is in climate zone 5.

The transmittance limit values depending on enclosure construction type ($U_{\rm max}$, Table 5), and the average transmittance limit value depending on the location of the enclosure in the building ($U_{\rm med}$, Table 6) detailed by all the regulations under study are compared below.

As shown in Table 5, the French legislation has the highest number of construction types for which different transmittances are determined. Thus, the actual insulation limits that can be achieved in each construction type are more closely adapted, e.g., the insulation required for curtain walls compared with the insulation required for other walls. In many countries, where these types are not listed as

distinct types of construction, the insulating requirements are the same as those for other enclosures.

Table 6 provides a comparison of the average transmittance limits that are required by the different standards depending on the location of the enclosures. These transmittances can be used to calculate the overall heat transfer coefficient of the building to comprehensively compare the different insulation requirements between the standards. Thus, to obtain the coefficient that provides an equivalent value in all the regulations, it was calculated for all the cases, with the same thermal envelope (which is composed of a surface percentage of walls, floors, ceilings, and standard windows). The Spanish Institute for Diversification and Energy Savings (IDAE) [76] defines the standard envelope as one in which the sum of the wall surfaces is equal to the sum of the surface areas of the floor and the roof. In addition, the percentage of glass window/doors existing in the walls is 30%. These surface values are considered average in houses. Table 6 includes the resulting value for each country. A sample calculation for the particular case of Germany is shown in the following equation:

$$H = 0.5*((0.2*0.7 + 1.3*0.3)) + 0.5*((0.28 + 0.20)/2) = 0.385 \text{ in W/(m}^2 \text{ K})$$

(8)

Of all the regulations discussed above, the least demanding are the Spanish regulations, whereas the most demanding are the German

Table 5Comparison of the transmittance limits of each type of enclosure defined by the different regulations.

Construction type	Transmittance limits depending on the enclosure construction type $(W/m^2 \ K)$						
	Germany ^a	France	England and Wales ^a	Spain	Passivhaus ^a	USA (ASHRAE)	
Walls in contact with the outside and the ground	0.20 ^b	0.45	0.25 (0.22°)	0.74	0.15	0.45	
Walls with unheated space	0.35 ^d	0.45/b ^e	0.25	0.74	0.15 ^a	0.45	
Walls between residential and non-residential areas	0.20^{a}	0.50	0.25 ^a	0.74^{a}	0.15	0.45^{a}	
Curtain walls	0.20^{a}	2.60	0.25 ^a	0.74^{a}	0.15 ^a	0.45^{a}	
Slab on grade floors	0.28	0.36	0.25 (0.17)	0.62	0.15	0.27	
Sanitary forging or wrought adjacent to unheated space	0.28 ^a	0.40	0.25 (0.17)	0.62^{a}	0.15	0.27^{a}	
Concrete or masonry roofs or high-strength metal plates	0.20	0.34	0.20 (0.14)	0.46	0.15	0.36^{a}	
Metal roofing sheets	0.20	0.41	0.20 (0.14)	0.46	0.15	0.36	
Other roof types	0.20	0.28	0.20 (0.14)	0.46	0.15	0.36	
Windows and doors	1.30 (windows) 1.80 (doors)	2.60	2.00 (0.90)	3.10	0.80	1.99	
Window blind boxes	-	3.00	-	-	Evitar puentes térmicos		

^a The legislation does not contain this type of construction, and the data provided is similar to the data for another type of construction with the same function. In countries where only the transmittance limit is required for each envelope zone, the values of this transmittance limit are shown.

Table 6Average envelope transmittance limit values for climates with similar degree-day intervals.

Location	Average transmittance limit depending on the location of the building enclosure ($W/(m^2 K)$)							
	Germany	France	England and Wales	Spain	Passivhaus	USA (ASHRAE)		
Exterior walls	0.20	0.36	0.25 (0.30) ^a	0.57	0.15	0.45		
Floors	0.28	0.27	0.18 (0.25)	0.48	0.15	0.27		
Roofs	0.20	0.20	0.15 (0.20)	0.35	0.15	0.36 ^b		
Glass windows/doors	1.30	1.80	1.60 (2.00)	2.70	0.80	1.99		
Overall heat transfer coefficient in the building (H) ^c	0.385	0.513	0.410	0.812	0.247	0.613		
Deviation (%) from the Passivhaus H	55.87	107.69	65.99	228.74	0	148.18		

^a The lowest value allowed with the best installations is shown in brackets.

and the Anglo-Welsh regulations, which are also those which most closely approach the near-zero energy consumption achieved by the Passivhaus building standard. The values of the ASHRAE standard are situated between the French and the Spanish regulations and are higher than the average values described by the European requirements.

3.4. Compactness factor

Only the Passivhaus standard provides a numerical value to regulate the compactness factor of the buildings, and this is the only value recommended. In the French and German regulations, a maximum numerical value for the compactness factor is not provided, but the disaggregation of buildings is penalized by setting different maximum values for the overall heat transfer coefficients of the buildings (Eq. (2)) depending on the building type (the classification of which is based on the differences in the compactness of the buildings) to differentiate between housing blocks and single-family houses. In Germany, housing blocks must have a specific heat transfer coefficient of less than 0.65 W/m² K, whereas single-family houses must have a specific heat transfer coefficient between 0.4 and 0.5 W/m² K. The German regulations also require a lower H when the ratio of the area of a dwelling to the height of the building is more unfavorable, e.g., double-height spaces are penalized.

In French law, this parameter is known as U_{BAT} . For single-family houses, $U_{\text{BAT,max}} = U_{\text{BATbase}}$: 1.20, whereas $U_{\text{BAT,max}} = U_{\text{BATbase}}$: 1.25 for

housing blocks. Furthermore, single-family houses have more restrictive transmittance limits for the joints of the envelope elements.

In all the other standards, the compactness factor is not considered in single-family buildings compared with residential blocks. In fact, in the regulations of both Spain and England/Wales, single-family houses are allowed to consume more energy (kW h/ (m² year)) [77,78] than housing blocks. In another way, the single family buildings would be required to have lower transmittance limits than housing blocks to obtain the same energy rating. Thus, as shown in Table 7, there is a great disparity in the regulation of this factor.

3.5. Indoor temperature

The indoor temperature is the only factor that is included in the EN reference standards that allows harmonization of the values in all the regulations. This factor is regulated through the operating temperature, as specified in Section 3.1.3 and in Eq. (7). Two European standards govern the operating temperatures needed to achieve thermal comfort in rooms. These standards include the EN ISO 7730:2006: ergonomics of the thermal environment standard [68] and the EN 15251: 2008: indoor environmental input parameters for the design and assessment of the energy performance of buildings addressing indoor air quality, thermal conditions, lighting, and acoustics [80]. Table 8 shows the recommended operating temperature ranges listed in both ENs and in the regulations analyzed in this paper. These temperatures were

^b Only exterior walls.

^c In England, the values in parentheses are the limits to be achieved in 2013.

d Also includes basement walls.

e Loss reduction coefficient for defined unheated spaces.

^b Transmittance value when the roof is over an attic.

c It is assumed that the external wall surface is equal to sum of the floor and the roof surfaces and that the percentage of windows/doors is approximately 30%.

Table 7Compactness factors and penalizations in building insulation included in the different regulations analyzed.

Means to regulate the compactness factor	Germany [43]	France [51]	UK [77]	Spain [78,79]	Passivhaus [64]	USA [43]
Using a specific value By penalizing the maximum limit of $H(\%)^a$	No	No	No	No	Less than 0.6	No
	+37.5 to +62.5%	+4.16%	No	No	No	No

^a The difference (in percentage) of the values required for the specific heat transfer coefficient (H) of a single-family house regarding with a housing block.

 Table 8

 Room temperature required by the studied standards.

Operative temperatures	EN 15251 PPD < 10%	EN 7730 PPD < 15%	Germany [49,81]	France [55,82]	UK (England and Wales) [59]	Spain [63]	Passivhaus [64]	USA [83,84]
T _{op} housing (°C)	18-27 ^a	19–27	20-24 ^b	19–22 (26) ^c 15–18 night ^d	20-26	21-25	19–26	20-26.6 ^e
$T_{\rm op}$ bathrooms (°C)	18-27 ^a	19–27	24 ^b	22–24	20-26	21-25	19–26	20-26.6 ^e

^a The recommended temperature range defined in UNE 15251 for new and renovated buildings is 20-26 °C.

selected considering the typical residential building values for the parameters defined in Section 3.1.3:

- A PPD of 15%, which is designated as suitable in EN ISO 7730:2006 for residential use; this norm has been adopted by each of the above-mentioned countries. However, the EN 15251: 2008 standard indicates that the expectation for new and renovated buildings should correspond to a PPD of less than 10%. Therefore, the operational temperature values shown in Table 7 include both these PPD values.
- A metabolic rate of 1.2 met (sedentary activity rate, typical for residential usages).
- A clothing thermal insulation of 1 Clo in the winter and 0.5 Clo in the summer.
- An air speed of less than 0.25 m/s under cold conditions and less than 0.50 m/s under hot conditions.
- A relative humidity of 60% in the summer and 40% in the winter.

The indoor temperature range is a factor that is harmonized among the different EU countries because there is an EN that establishes the maximum range of accepted values. Harmonization also exists with respect to the regulations of the United States because there is an international ISO standard that all countries have adapted, as indicated in Section 2. The existence of an international standard that provides quantitative values, contributing to the harmonization of the regulatory requirements among the different countries, was confirmed.

The more stringent regulations are the Spanish and French regulations (because the German regulations allow the mean values to be exceeded occasionally, as shown in Table 8). For a given outdoor temperature, the establishment of a more restrictive indoor temperature involves more powerful air conditioning facilities and therefore increased energy consumption. The other standards have similar values.

Furthermore, both the German and the French regulations require different temperatures depending on the enclosure usage. Independent temperature control systems should be used for areas that are used differently to ultimately optimize the energy consumption [85].

Of all the regulations and standards studied, the Passivhaus standard allows a wider range of temperatures. As specified in the standard itself [64], the range is extended due to the high level of insulation that is required in the envelope. Due to this level of envelope insulation, the internal temperature of the walls is notably close to the indoor temperature (air temperature), which reduces the radiation heat exchanged between the people and the walls. Therefore, by increasing the mean radiant temperature of the walls, a lower indoor temperature is required to achieve the same operating temperature; thus, thermal comfort can be achieved at indoor temperatures close to 18 °C [64]. As discussed in Section 3.3.3, the difference between the transmittance required in windows and the rest of the construction elements is lower in the Passivhaus standard than in the other regulations. This fact, combined with the criterion for preventing the creation of thermal bridges, prevents the cold-wall effect, which leads to the need for a lower average air temperature in the building to obtain the same sensation of thermal comfort.

Therefore, the indoor temperature required for thermal comfort in houses depends directly on the value and uniformity of the thermal insulation of the building envelope (i.e., its transmittance). By increasing the insulation, the required indoor temperature decreases (and thus the air conditioning needed), which saves double the amount of energy, as demonstrated in scientific studies [36].

4. Proposed methodology to harmonize the maximum allowable energy loss through the building envelope

The lack of harmonization in the definition of climate zones, in addition to the absence of quantitative transmittance reference values for all the countries, makes that the envelope energy losses vary from one country to another. As a result, it is difficult to unify criteria and energy efficiency objectives in buildings across different countries. For this purpose, a methodology is proposed to harmonize the maximum allowable energy loss through the building envelope. This methodology considers the three factors that were discussed in the paper and consists of the following stages:

 Regulation of a "maximum limit of envelope energy losses" (i.e., due only to heat transfer in building enclosures) by supranational organizations. This parameter would not be influenced by other

^b Mean values required for the winter and summer during normal operation; however, the minimum and maximum values of 20 °C and 26 °C, respectively, can be exceeded on occasion.

 $^{^{}m c}$ By day and only when the premises are occupied. The order of 24 May 2006 extends the upper limit to 26 $^{
m c}$ C.

d At night.

e The 55-2004 standard calculation with an optimal value of skin permeability of 0.06 was applied.

factors that determine the energy consumption of buildings, such as the building facilities.

- 2. Generation of a world map of degree-days such that all countries calculate the envelope energy losses using the same base temperature of 20 °C that is recommended by EN 15251: 2008. This approach would ensure that the energy losses calculated in all the countries are equivalent and comparable.
- 3. Calculation of the overall heat transfer coefficient of the building (*H*) that allows to comply with the defined maximum limit of envelope energy losses regulated in item 1 depending on the degree-days of the region where the building is located and given the total area of the envelope. The introduction of this factor in the methodology implies the consideration of the compactness factor of the building. The coefficient would be calculated using the following equation:

H (in W/m² K) = maximum limit of envelope energy losses/A_{Total} · (degree – days per year)

(10)

4. Selection of the transmittance of each enclosure such that is complies with the overall heat transfer coefficient of the building calculated in Section 3. This transmittance should also be adapted to the procedures, practices, and construction techniques, which are often different in different countries.

5. Future research lines

A value of maximum limit of envelope energy losses should be established according to the global energy strategies and international directives agreed by different countries. This value could also be adapted according to the particular situations and needs of each nation by setting harmonization deadlines. Although the construction techniques and materials used vary substantially among countries, the harmonization of this maximum limit would result in a gradual homogenization of the construction practices in any zone with similar degree-days. Therefore, several lines of future research may be suggested.

A compromise between the energy and the cost-optimal levels for each country should be set. This research point is very important because, from an economic standpoint, the proposed constructive solutions should achieve an optimal energy consumption that would allow an economical amortization.

In turn, this homogenization should encourage more sustainable practices. For this purpose, a database with different constructive solutions that can fulfill the established maximum limit should be generated, considering the building materials, the local knowledge and the construction techniques available in each region. Several comprehensive analyses should be performed to verify the sustainability (e.g., life cycle analysis) of each proposed solution.

6. Conclusions

In this paper the regulatory requirements have been analyzed and compared that are set by the United States and several EU countries for three key factors that determine the energy consumption of buildings: the thermal envelope transmittance, the compactness factor, and the indoor temperature. The requirements of the Passivhaus standard have been considered to be the optimal energy reference. This standard is an example of the construction of nearly zero-energy buildings, which will be required by the European Directive 2010/31/EU by the year 2020.

This study found that the factor with less divergence across countries is the indoor temperature because there is an

international standard that sets the maximum range of accepted indoor temperature values. In contrast, the compactness factor and the transmittance values of the thermal envelope are not harmonized in the countries that were analyzed in this study because these parameters are unregulated at the international level (and at the supranational level in the case of Europe). Moreover, it has been found that the establishment of climate zones in each country is based on different ranges of degree-day variations, which are calculated using different base temperatures. This lack of harmonization suggests large variations of the envelope energy losses regulated in each country.

To solve this problem, a methodology was proposed that includes a global definition and global requirements of the maximum limit of envelope energy losses. Additionally, a world map of degree-days should be developed such that all countries calculate this parameter using the same base temperature. Therefore, the calculated energy losses would be equivalent and comparable. The overall heat transfer coefficient of a building would accordingly be calculated using this parameter and the degree-days shown in the developed map. Subsequently, the required transmittance values for the enclosures will be imposed at the national level.

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